

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
Jackson Division

MISSISSIPPI ASSOCIATION OF  
EDUCATORS, BARBARA PHILLIPS,  
JAMES THOMAS, DAWN ZIMMERER,  
L.E. JIBOL, UNITED CAMPUS  
WORKERS SOUTHEAST LOCAL 3821,  
MADISYN DONLEY, ALEXIS COBBS,  
KAREN ADERER, FOSTERING  
LGBTQ+ ADVOCACY, RESOURCES,  
ENVIRONMENTS AND WOMEN IN  
SCIENCE AND ENGINEERING,

*Plaintiffs,*

Civil No. 3:25-cv-417-HTW-LGI

v.

BOARD OF TRUSTEES OF STATE  
INSTITUTIONS OF HIGHER  
LEARNING, MISSISSIPPI COMMUNITY  
COLLEGE BOARD, MISSISSIPPI STATE  
BOARD OF EDUCATION, MISSISSIPPI  
CHARTER SCHOOL AUTHORIZER  
BOARD,

*Defendants.*

**DECLARATION OF MADISYN DONLEY**

I, Madisyn Donley, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am over the age of eighteen and competent to make this declaration. I make this declaration based on my personal knowledge.
2. I am a third-year law student at the University of Mississippi School of Law. I am currently enrolled in classes that cover a wide range of topics essential to legal education, including constitutional law, civil rights, criminal law, and professional responsibility.
3. As part of my legal education, my professors have regularly addressed issues involving race, racism, gender, sexual identity, implicit bias, and other subjects that are critically relevant to understanding the operation of the law and the legal system. These discussions are foundational to developing a meaningful and modern legal education.
4. Mississippi's recently enacted anti-DEI legislation has created an atmosphere of uncertainty and fear at the law school. Based on the vague and sweeping language of the law, I understand that professors may now be discouraged or prohibited from engaging in discussions that are essential to a comprehensive legal education. I will be affected by sections 3(b), 3(i), 3(f), and 3(g) of HB 1193.
5. I am deeply concerned that this law will prevent my professors from exploring key issues that intersect with legal doctrine and social reality. As a result, I believe I am being denied access to the kind of robust, inclusive education that students at other law schools receive—and that I will be at a disadvantage in future legal practice because of it.
6. In addition to my academic coursework, I am actively involved in student organizations at the law school that engage in discussions around race, gender, identity, inequality, and access to justice. These organizations receive funding from the University of Mississippi, which includes state funds.
7. I am concerned that the anti-DEI legislation may be used to justify cutting or eliminating funding for these student organizations based on the topics we discuss and the events we host. This would not only silence student voices but also deny meaningful

8. I am also personally concerned that if I raise issues of race, gender, or sexual identity in class discussions, I could face academic discipline or even expulsion. The chilling effect of this law discourages open discussion and meaningful engagement in the classroom.

9. I came to law school to be challenged intellectually, to engage in difficult conversations, and to develop the knowledge and skills necessary to serve my clients and community with integrity. Mississippi's anti-DEI law undermines that mission and places me—and many of my classmates—at both academic and professional risk.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 13 day of June, 2025, in Oxford, Mississippi.



Madisyn Donley

3L Student, University of Mississippi School of Law